

DEPARTMENT OF THE ARMY MASSACHUSETTS ARMY NATIONAL GUARD TRAINING SITE CAMP EDWARDS, MASSACHUSETTS 02542-5003

REPLY TO ATTENTION OF

3 December, 2010

Lynne Jennings MMR Program Manager US EPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023

Mrs. Lynne Jennings:

The Massachusetts Army National Guard requests that the U.S. Environmental Protection Agency (EPA) Region 1 extend the Pilot Period for Juliet, Kilo, and Tango Ranges through 30 March 2012 or until such time that an appropriate data set, soil and water monitoring, can be established for review by the EPA.

As you are aware this is the second extension request post pilot period approval. Extensions have been requested as a result of incomplete range construction such as STAPP system installation delays, site drainage construction delays, and installation of lysimeters being delayed as a result of the site drainage issue. The delays were the result of material availability, weather, and funding issues.

During the 2010 training year the following items were completed and or installed per the 2010 Pilot Period Extension Approval Letter and the original pilot period agreement for Juliet, Kilo and Tango Ranges:

- a. Drainage was corrected on Juliet and Kilo Ranges
- b. Lysimeters were installed on Juliet and Kilo Ranges and reconfigured on Tango Range.
- Soil, pore water and groundwater samples were taken on Juliet, Kilo, and Tango Ranges.
- d. The results and report are expected December 2010.
- e. Sampling for 2011 would be expected to take place June 2011 with results and report provided for August 2011.

Again in requesting this extension, the MAARNG would like to have an appropriate data set, soil and water monitoring, which can be reviewed and discussed to determine if the requirements of the Pilot Period Approval have been met and so that these ranges, Juliet, Kilo, and Tango Ranges, can be removed from AO2 and its associated Scope of Work.

The next sampling round for these ranges with funding in place is currently being coordinated with US Army Corps of Engineers (ACE). By 31 December 2011 there would be 3 soil and water samplings for Tango Range and 2 sampling periods for Juliet and Kilo Ranges.

This extension would be in accordance with the conditions set forth in your Approval Letter dated 28 January 2009, EPA Docket No. SDWA I-97-1030, Final Revised Limited Authorization for Lead Ammunition Training.

Juliet, Kilo, and Tango Range would continue to be operated under the range specific Operation Maintenance and Monitoring Plans (OMMP) "Revision2: 23 January 2009" or an approved updated OMMP.

Copies of this letter will be furnished to the United States Army National Guard Bureau *Installations, Logistics and Environmental directorate, the Deputy Chief of Staff for Operations and* Training, Massachusetts National Guard and the Small Arms Range Working Group.

The Point of Contact for this Letter is Michael Ciaranca, Ph.D., Deputy Director of the Environmental and Readiness Center: michael.ciaranca@us.army.mil or 508-968-5154.

The Massachusetts Army National Guard respectfully asks that the United State Environmental Protection Agency, Region 1 respond favorably to this request.

Sincerely,

Richard V. Crivello Colonel, MAARNG Commanding